

CAPER

Comprehensive Annual Performance and Evaluation Report

For Fiscal Year 2011

ALLENTOWN, PENNSYLVANIA

Reporting Period:

July 1, 2011 through June 30, 2012

Submitted by:

CITY OF ALLENTOWN

DEPARTMENT OF COMMUNITY AND ECONOMIC DEVELOPMENT

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Allentown, Pennsylvania

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Executive Summary

Provide a brief overview that includes major initiatives and highlights how activities undertaken during the program year addressed strategic plan objectives and areas of high priority identified in the consolidated plan.

This Consolidated Annual Performance and Evaluation Report (CAPER) is for the City of Allentown, Pennsylvania. Allentown is a federal entitlement community receiving Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Shelter Grants (ESG) funds from the United States Department of Housing and Urban Development (HUD). A Five-Year Consolidated Plan (CP) for the program years 2010 through 2014 was adopted. The CP allows a community to take a comprehensive approach to the use of resources granted to the community by HUD. On an annual basis, the City of Allentown submits an Action Plan containing the proposed activities outlining the use of federal funds for the upcoming program year. The Action Plan relates the activities to goals and objectives outlined in the Five-Year Consolidated Plan. The City's 37th fiscal year for grant funds ran July 1, 2011 to June 30, 2012.

The Five-Year Consolidated Plan laid out a strategic plan containing housing goals, community development goals, homeless and special population goals, economic development goals, and planning goals. During FY2011, the City undertook actions to address these goals including:

- Acquisition of Substandard Properties (LMH,SBA) – City Hall
- Property Disposition & Management (LMH,SBA) – City Hall
- Demolition of Substandard Properties – City Hall
- P.L.A.C.E. Program (Lehigh Valley Center for Independent Living) – Allentown Drive
- English to Speakers of Other Languages (The Literacy Center)– Hamilton Street
- Daybreak (Lehigh County Conference of Churches) – W. Chew Street
- Scholarship Program (Grace Episcopal Church- Grace Montessori School) – W. Linden Street
- Inner City Neighborhood Scholarship Program (The Baum School of Art) – W. Linden Street
- School to Career Transition Program (Communities In Schools) – W. Chew Street
- Community Action Financial Services (Community Action Committee of the Lehigh Valley) – E. 5th Street, Bethlehem
- Home Ownership Outreach Program (Neighborhood Housing Services of the Lehigh Valley) – N. 10th Street
- Make Your M.A.R.K. (Boys & Girl Club of Allentown) – N. 7th Street
- St. Luke's Neighborhood Center (St. Luke's Neighborhood Center) – N. 7th Street
- Summer Enrichment Program (Mosser Village Family Center) – S. Carlisle Street
- Earn-A-Bike Program (Community Bike Works) – N. Madison Street
- Embrace Your Dreams (Embrace Your Dreams) – N. 6th Street
- Ways to Work Program (Family Answers) – W. Walnut Street
- Allentown Public Library (Allentown Public Library) – W. Hamilton Street
- The Next Step to Success (Lehigh Carbon Community College) – W. Hamilton Street
- Project Outreach (Syrian Arab American Charity Assoc.) – N. 2nd Street

- Program for Women and Families (Program for Women and Families) – W. Gordon Street
- Securing Industrial/Commercial Properties (Allentown Economic Development Corporation) – City Hall
- Neighborhood Clean-Up (City of Allentown Bureau of Building Standards And Safety)
- Foreclosure Work-out Program (City of Allentown Bureau of Building Standards And Safety)
- Alliance Summer Recreation Program (Allentown Health Bureau) – N. 6th Street
- Turning Point of the Lehigh Valley
- Voluntary Relocation – City Hall
- Community Partnerships Program – N. 10th Street
- Focus Area Rehabilitation (CDBG Deferred Payment Loans)
- Hazard Elimination Program
- Focus Area Façade Grants – Residential
- Façade Improvement Program (Old Allentown Preservation Association) – N. 10th Street
- Seventh Street Façade Grants – Commercial
- Systematic Code Enforcement – City of Allentown Bureau of Building Standards And Safety
- Micro-Enterprise Assistance (Community Action Development Corporation of the Lehigh Valley) – N. 7th Street
- Economic Development Project (AEDC) – City Hall
- Community Development Planning – City of Allentown Department of Community and Economic Development
- Fair Housing – City of Allentown Department of Community and Economic Development
- General Management (CDBG) – City Hall

I. Summary of Resources and Distribution of Funds

Identify the Federal funds made available for furthering the objectives of the consolidated plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of low-income and minority concentration). The geographic distribution and expenditure requirement may be satisfied by specifying the census tracts where expenditures were concentrated and the percentage of funds expended in target areas. The jurisdiction must also submit an updated CDBG Financial Summary Report (PR26).

A. Funds Available

During FY2011, the City had anticipated having funds from the various programs as follows:

Program	Entitlement Grant	Other Funds*	TOTAL
Community Development Block Grant (CDBG)	\$2,506,405	\$0	\$2,506,405

Home Investment Partnerships (HOME)	\$940,036	\$0	\$940,036
Emergency Shelter Grant (ESG)	\$ 121,549	\$0	\$ 121,549

**CDBG and HOME funds include reprogrammed funds from previous years and anticipated program income.*

In addition, the City received an allocation of HOPWA funds in the amount of \$292,755 which is administered the Commonwealth of Pennsylvania.

Other federal funds that are available in the City of Allentown include:

- Allentown Housing Authority Section 8 and Public Housing programs
- Continuum of Care Supportive Housing Program and Shelter Plus Care
- Neighborhood Stabilization Program
- Low Income Housing Tax Credits – awarded to Greystone Apartments, located at 106 S. 7th Street and 702 Walnut Street

B. Funds Committed and Expended

In FY2011, the City of Allentown received an entitlement grant in the amount of \$2,506,405.

The City had total expenditures in the amount of \$2,336,173.23. Of this amount, \$1,683,533.24 was spent on activities for low and moderate income individuals and households and \$512,978.79 was allocated for planning and program administration. Most funds were expended as follows:

Acquisition:	\$ 39,439.68
Disposition/Property Management:	\$ 43,854.08
Clearance: 2 properties	\$ 96,277.21
Relocation: 5 households	\$ 1,600.00
Economic Development:	\$104,634.76

Housing:		
Homeownership:	\$ 66,487.25	CDBG
Rehab single unit:	\$ 892,428.23	CDBG
	\$ 510,976.02	HOME
Rehab Multi-unit:	\$ 120,000.00	HOME
Code Enforcement	\$195,211.54	CDBG

Public Services:	\$316,270.65
Administration:	\$512,978.79

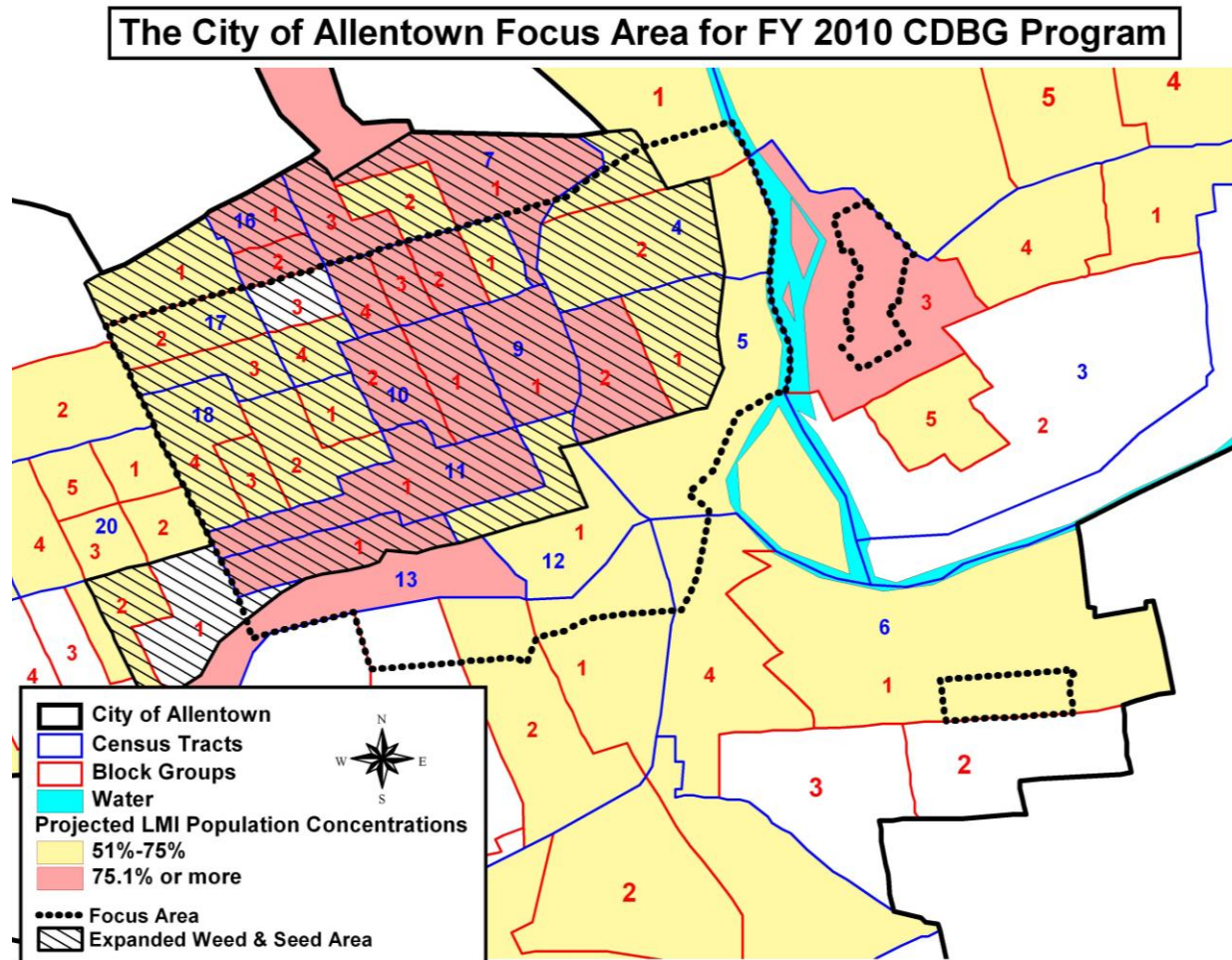
C. Geographic Distribution

The City has defined an area of greatest need, called the Focus Area. The Focus area contains the most comprehensive range of strategies for accomplishments to be reported in this CAPER. These programs include:

- The Acquisition of Substandard Property activity sheet notes that the properties they intend to acquire, and subsequently rehabilitate, are CTs and BGs in the Focus Area.

- The Focus Area Rehabilitation – Self Forgiving Loans and Focus Area Façade Grants – Residential activities take place in the Focus Area, but specifically in CT 16, BG 3 & 4; and CT 10, BG 2.
- The Façade Improvement Program activity takes place in CT 16, BG 4; CT 17, BG 4; and CT 18
- The Seventh Street Façade Grants – Commercial activity takes place in CT 10, BG 2; CT 11, BG 1

Funding spent in the Focus Area constituted 70% of the grant funds.



II. General CAPER Narratives

A. Assessment of the Three- to Five-Year Goals and Objectives

- a. Describe the accomplishments in attaining the goals and objectives for the reporting period. This should be summary information so that HUD and citizens can easily assess progress made toward meeting longer term goals.

During the program year, the City undertook activities to implement the goals and objectives outlined in the Five-Year Consolidated Plan.

Housing Goals & Objectives

- I. **Priority Activity #1:** To maintain and improve the condition of the housing stock to meet or exceed current code standards and to reduce overcrowding in housing units as defined in the City's Property Maintenance Code. The five year objectives are:
 - Inspect **1,500** properties and provide follow-up on prior years' inspections
 - Continue aggressively enforcing overcrowding ordinances
 - Encourage property owners, particularly LMI owners within the Focus Area, to apply for no-interest, self-forgiving loans
 - Provide **175** self-forgiving housing rehabilitation loans to LMI homeowners residing within the Focus Area
 - Provide **50** Hazard elimination loans to homeowners residing outside of the Focus Area
 - Provide housing rehabilitation self-forgiving loans to LMI homeowners residing outside the focus area, on an as needed/emergency basis.

Accomplishments:

Program	5-Year Goal	Annual Goal	FY2011 Accomplishment
Housing Inspections	1,500	300	316
Rehabilitation in Focus Area	175	35	6 CDBG + 36 HOME
Hazard Elimination loans outside Focus Area	50	10	19
Focus Area Facades	100	20	41
Housing Rehab outside Focus Area	As needed	As needed	0

- II. **Priority Activity #2:** To make available affordable homeownership, within the existing housing stock (affordability is defined as spending no more than 35% of household income on housing related costs). The five year objectives are:
 - Acquire, in conjunction with the Redevelopment Authority of the City of Allentown (RACA), at least **25** vacant properties for use in homeownership programs

- Allocate acquired properties to nonprofits, including the Housing Association and Development Corporation and Alliance for Building Communities and Habitat for Humanity of the Lehigh Valley
- Assist **100** moderate income households in obtaining funds necessary for down payments and closing costs
- Develop new programs to encourage potential homeowners to buy properties in the Focus Area.

Accomplishments:

Program	5-Year Goal	Annual Goal	FY2011 Accomplishment
Acquire vacant properties for homeownership	25	5	0
Down payment and Closing cost assistance	100	20	20
Homesteading			1

III. *Priority Activity #3:* To increase the knowledge and skills necessary for residents to own and maintain their own home. The five year objectives are:

- Educate at least **300** families, particularly targeting LMI households, through the Home Ownership Counseling Program.

Accomplishments:

During the program year, the Community Action Committee of the Lehigh Valley (CACLV) continued its Community Action Financial Services Program, which includes homeownership counseling. This program prepared first-time buyers for the process of purchasing, owning and maintaining a home. Community Action Financial Services provided homeownership counseling to 10 households. In addition, 30 households attended the Homeownership Counseling Program seminars.

Program	5-Year Goal	Annual Goal	FY2011 Accomplishment
Homeownership Counseling	300	60	45

IV. *Priority Activity #4:* To support the provision of decent, safe, and affordable rental housing with the City and on a regional basis. The five year objectives are:

- Rehabilitate **50** units.
- Systematically inspect all rental units within the city through the Rental Unit Inspection Program, which is not funded with CDBG dollars.

Accomplishments:

Program	5-Year Goal	Annual Goal	FY2011 Accomplishment
Rental Rehabilitation	50	10	4

The Bureau of Building Standards and Safety administered the City's Rental Unit Inspection Program, which systematically inspects rental units within the City to ensure that renters are

living in decent, safe and sanitary rental units. The program does not utilize CDBG funds but is financially self-sufficient which ensures renter housing is code compliant.

The CDBG program provides management and oversight to the Rental Rehabilitation Loan Program. Rehabilitation loans are not CDBG-funded but staff does the screening and monitoring for the program. During the year, one loan was processed and four units were rehabilitated that are to be occupied by low and moderate income families.

Another aspect of ensuring decent and safe rental units is the education of tenants. CACLV conducted seminars for the “Right Stuff about Renting” Program in homeless shelters during which 82 people increased their knowledge about their rights and responsibilities as renters.

V. *Priority Activity #5:* To participate in a regional effort to make available a full array of permanent housing opportunities for special needs populations, to contribute to meeting the shelter and service needs of homeless residents of the City, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing. The five year objectives are:

- Provide supportive services such as counseling, case management, housing placement, and emergency rent assistance.
- Provide **10** loans to LMI homeowners, specifically the elderly and disabled, for adaptive rehabilitation.
- Aggressively seek additional funding sources for supportive housing for special needs populations.
- Work closely with homeless service providers to meet the shelter and service needs of the homeless on a regional level.
- Assist regional service providers in connecting the homeless with permanent supportive housing solutions.

Accomplishments:

Program	5-Year Goal	Annual Goal	FY2011 Accomplishment
Supportive Services	Not specified		
Rehabilitation loans for housing adaption	10	2	0

Shelter Programs	FY 2011 (Homeless Families & Individuals Assisted)
Sixth Street Shelter	349 individuals and 98 families
Salvation Army	255 women and children
Allentown Rescue Mission	645 men
Program for Women and Families	10 women and their children
Pathways	61 individuals

Supportive Services:

- The Lehigh Valley Center for Independent Living (CIL) received CDBG funds to provide services such as housing search support, tenant-landlord mediation, home modification consultation and housing retention education. These actions increase the housing options available to persons with disabilities and prevent homelessness. The CIL assisted 125 clients, all of whom are low and moderate income to find suitable, affordable housing within the City. Services helped 23 consumers find permanent housing and 67 consumers prevent homelessness, and 58 consumers received education on housing retention.
- Turning Point provides shelter for victims of domestic violence. During the year, 4 women were housed in the transitional living program and received social services to stabilize their lives.

Public Housing Goals & Objectives

- I. **Goal #1:** Maintain housing and a suitable living environment by:
 - Reducing public housing vacancies.
 - Leveraging private or other public funds to create additional housing opportunities;
 - Leveraging a future percentage of the Housing Authority annual Capital Funds appropriation by participating in a statewide issuance of Capital Fund Securitized Revenue Bonds in order to increase the pool of public funds available to rehabilitate, modernize, acquire, or create additional housing opportunities.
 - Acquiring or building units or developments.
- II. **Goal #2:** Improve the quality of assisted housing by:
 - Continuing to improve public housing management.
 - Continuing to improve voucher management.
 - Renovating or modernizing public housing units.
 - Demolishing or disposing of obsolete public housing.
 - Providing replacement public housing.
 - Providing replacement vouchers.
- III. **Goal #3:** Increase assisted housing choices by:
 - Conducting outreach efforts to potential voucher landlords.
 - Implementing voucher homeownership program.
 - Implementing public housing or other homeownership programs.
 - Implementing public housing site-based waiting lists.
- IV. **Goal #4:** Provide an improved living environment by:
 - Designating developments or buildings for particular resident groups (elderly and/or persons with disabilities).
 - Continuing efforts to reduce illegal drug activities and crime by supporting programs provided by the Boys and Girls Club activities and Neighborhood Police Programs, in conjunction with the City of Allentown.
 - Continuing support for the Tenant Council organizations.
 - Providing referrals to social service agencies as appropriate.

- V. **Goal #5:** Promote self-sufficiency and asset development of assisted households by:
- Increasing the number and percentage of employed persons in assisted families.
 - Providing or attracting supportive services to improve assistance recipients' employability.
 - Providing or attracting supportive services to increase independence for the elderly or families with disabilities.
- VI. **Goal #6:** Ensure equal opportunity and affirmatively further fair housing by:
- Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and/or disability.
 - Undertaking affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and/or disability.

Accomplishments

The Allentown Housing Authority (AHA) continued to work to keep its units in modern, safe, and sanitary condition. AHA continued to work with residents on recreation and job search activities.

Community Development Goals & Objectives

Economic Development & Job Creation

Short-Term Objectives and Strategies

- I. *Increase employment opportunities in the City, with special attention to strengthening the commercial/industrial base in the Focus Area and making it accessible to residents in the Focus Area*
- Assist existing firms within the Focus Area by following up on identified needs and initiating problem-solving activities
 - Encourage entrepreneurship of residents of the Focus Area by reducing the costs of suitable office space, obtaining financing, and providing technical assistance
 - Undertake infrastructure improvements that will promote commercial/industrial development within the Focus Area
 - Encourage small businesses located within the Focus Area to participate in existing loan programs, and create new loan programs to fill the gaps in available financing
 - Support employers' efforts to hire and train residents of the Focus Area
 - Provide direct loan assistance to for-profit businesses to retain existing jobs and create new jobs
 - Assemble sites in support of commercial and industrial development and expansion initiatives that result in the creation of jobs; pursue HUD Section 108 loan guarantees, as appropriate to stimulate private investment
 - Package employment incentives such as tax credits, on-the-job and customized job training to attract businesses to the Focus Area

II. Assist in the revitalization of the central business district

- Support the assembly of sites for the on-going development of Class A multi-user office space and new corporate headquarters within the central business district
- Support existing retail stores in the central business district that attract customers from throughout the region, and attract other specialty retailers
- Recruit additional restaurants to the central business district and support the expansion of cultural and entertainment activities downtown
- Encourage the utilization of currently-vacant upper floor space within the central business district
- Encourage the restoration and rehabilitation of older store fronts within the central business district
- Assure the provision of adequate parking within the central business district to support existing and proposed office development, retail shopping, cultural and entertainment activities, and residential development

III. Facilitate the adaptation and re-use of existing vacant and under-utilized land and buildings within the Focus Area

- Inform owners of vacant and under-utilized properties located within the Focus Area of the available programs to redevelop/reuse these sites, as well as their current market potential
- Provide financial and other inducements that promote the modernization of older industrial structures within the Focus Area
- Seek financial assistance for infrastructure development within the Focus Area when unique problems create extraordinary burdens in terms of cost of development
- Facilitate the clearing of structures within the Focus Area to create development opportunities when the cost of modernization of the existing structures is not feasible
- Initiate programs to overcome special burdens of environmental clean-up of otherwise suitable industrial sites within the Focus Area
- Review City zoning, building, and fire protection ordinances to ensure they do not unduly restrict the use and design of older structures and their processes are executed in a timely and orderly manner
- For larger industrial building modernization and expansion projects located in the Focus Area, work with neighborhood groups in the area to create forums for communicating improvement plans between the firms and the neighborhoods
- Consider commercial, residential and institutional alternative uses which are neighborhood compatible for obsolete industrial structures within the Focus Area

IV. Increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents of the Focus Area

- Assess the skills needed by businesses located throughout the region
- Assess the accessibility and availability of basic skills and vocational training opportunities for Focus Area residents
- Assist basic skills providers and educational institutions in meeting the needs of Focus Area residents

- Promote and coordinate community based organizations and State Employment Center programs that identify available human resources and match employment skills to employer requirements

V. Strengthen Focus Area retail and service areas

- Examine the services and space available within existing neighborhood business areas within the Focus Area
- Work with neighborhood groups to identify the service needs of Focus Area residents
- Recruit businesses for the neighborhood business areas within the Focus Area by providing financial, location and technical assistance

VI. Facilitate Focus Area residents' ability to access jobs by removing impediments

- Work with LANTA in adjusting bus routes and hours of operation to improve the accessibility of area employment centers to Focus Area residents
- Work with employers and dependent care providers to improve the accessibility and affordability of child care/elder care throughout the City

VII. Enhance transportation and utility infrastructure to better serve existing business and attract new types of businesses and industries

- Improve transportation infrastructure in the City, particularly in the Focus Area, to attract new and diverse businesses and spur job creation
- Explore the potential for utility infrastructure upgrades, such as Wi-Fi hubs or fiber optic lines, to attract hi-tech businesses and industry to the central business district

Accomplishments

In FY2011, CDBG funds were used to provide façade improvement grants to three (3) businesses on the Seventh Street Corridor. The Allentown Economic Development Corporation (AEDC) received \$13,500 to secure industrial and commercial properties along the waterfront and downtown.

The City also provided funds to the Literacy Center to improve English-language skills that resulted in improved employment prospects for 50 people.

The Start Your Business Program of the Community Action Development Corporation assisted 87 persons. Twenty-two persons enrolled in the Start Your Business classes, seven made substantial progress in starting their businesses and four people started their own businesses. CADC provided technical assistance to existing small businesses to continue the businesses.

Community Recreational/Educational Programming & Facilities

Short-Term Objectives and Strategies

I. Enhance utilization of existing public/quasi-public facilities for neighborhood activities

- Conduct an inventory of facilities suitable for neighborhood activities, starting in the Focus Area

- Discuss the availability of each facility with its owner
- Assess the service needs of each neighborhood that could be addressed through enhanced utilization of existing facilities, using the Parks and Recreation Master Plan and other plans as a starting point
- Work with community groups, facility owners and service providers to develop a schedule of activities for each neighborhood's facilities

II. Properly maintain and improve the condition of publicly-owned facilities

- Work with other government agencies to assess the condition of public facilities, starting in the Focus Area, and to prepare a cost estimate to renovate the facilities taking into consideration their expanded use
- Apply for federal, state, and private grants to partially fund the renovation of City-owned facilities
- Upgrade City-owned facilities through regular allocations from the Capital Budget
- Encourage other government entities to apply for federal, state and private grants to partially fund the renovations
- Encourage neighborhood groups to assist in maintenance and improvement efforts

III. Increase the number of and access to recreational/educational program opportunities within the Focus Area

- Examine the recreation/education needs of citizens living in the Focus Area
- Work with recreation/education service providers to offer desired services
- Support the provision of recreational/educational programs within the Focus Area, whenever possible
- Support the provision of convenient transportation to the desired activities when services cannot be provided within the Focus Area
- Encourage recreation/education service providers to recognize other human service needs of participants in the recreation programs, and to make appropriate referrals to other social service agencies

Accomplishments

During the program year, the City funded a variety of educational and recreational programs for Focus Area youth and adults. The following chart demonstrates the number of low and moderate income persons who were assisted during the program year.

Program	FY 2011 Accomplishment
Community Bike Works	114 youth earn a bike program
Alliance Hall Summer Recreation Program	153 youth recreational programs
Allentown Public Library	101 students educational and computer programs
Boys & Girls Club of Allentown	92 youth – Make your M.A.R.K.
Grace Episcopal Church- Grace Montessori School	11 children- Scholarship Program
St. Luke’s Neighborhood Center	26 youth programs and neighborhood clean-ups
Mosser Village Family Center	52 youth summer educational and recreational program
The Baum School of Art	32 youth after school art program
Embrace Your Dreams	128 youth golf and tennis program

Infrastructure

Short-Term Objectives and Strategies

- I. Pursue infrastructure improvements that will promote commercial/industrial development within the Focus Area*
 - support the assembly of adjacent sites for the on-going development of office space and new corporate headquarters within the central business district, or industrial
 - require property owners to replace curb and sidewalk when they are in violation of the City Code, in areas where systematic code enforcement inspections are being conducted
- II. Pursue infrastructure improvements in residential neighborhoods that encourage multi-modal transportation options and offer residents the ability to choose*
 - work with LANTA in adjusting bus routes and hours of operation to improve the accessibility of area employment and entertainment centers to Focus Area residents
 - explore the feasibility of alternative transportation systems, such as sharrows (road lanes shared by cars and bikes) and separated bike networks
 - support the installation of signage for alternative transportation networks for residents and way-finding signage for tourists and visitors

III. Ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support these potential uses

- obtain financial assistance for infrastructure development within the Focus Area when unique problems create extraordinary burdens in terms of cost development
- establish a land bank of vacant/under-utilized properties and create a priority list for improvement/development of these properties predicated upon their marketability

Accomplishments

No progress to report.

Livability

Short-Term Objectives and Strategies

I. Increase cleanliness and a sense of well-being in the City's neighborhoods

- Locate trash cans in the public right-of-way in the Focus Area, wherever practical
- Promote neighborhood clean-up efforts City-wide
- Support programs that recognize individual or neighborhood efforts to maintain or improve appearance of neighborhoods
- Develop programs to facilitate the revitalization of vacant, boarded, and/or deteriorated properties

II. Increase the percentage of homeownership in the focus and rehabilitation areas

- Offer incentives to encourage potential homeowners to buy properties in the Focus Area
- Develop new programs that encourage homeownership
- Provide rehabilitation loans for code corrective work to homeowners residing in the Focus Area

III. Decrease the housing density within the Focus Area

- Encourage the deconversion of multi-family structures in overcrowded Focus Area neighborhoods, especially where the original floor plans were single-family homes
- Selectively demolish condemned and deteriorated properties in the Focus Area for which no feasible reuse may be found

IV. Support existing neighborhood groups and promote the development of new community organizations throughout the City

- Coordinate City services to complement the efforts of neighborhood groups and residents, especially in the Focus Area
- Strengthen the relationships among neighborhood groups, community institutions, businesses, government, and residents, especially in the Focus Area
- Work with interested community groups City-wide to develop neighborhood improvement plans

V. Increase the supply of parking in the Focus and Rehabilitation Areas

- Create neighborhood parking lots throughout the Focus Area

- Work with LANTA in adjusting bus routes and hours of operation to better meet the needs of potential riders in the focus and rehabilitation areas, thereby reducing residents' dependence on automobiles

VI. Promote the architectural and cultural resources that exist in many City neighborhoods

- Work with cultural organizations to develop additional programs aimed at encouraging people to take advantage of the City's many cultural resources, including theaters, museums, restaurants, and ethnic events
- Work with community organizations to promote the benefits of preserving, reusing, and restoring the City's architecturally and historically significant buildings, sites, and neighborhoods
- Offer incentives for restoration or historically sensitive rehabilitation and reuse of properties in the City's historic and architecturally significant areas
- Offer grants for the difference between the amount required to meet the Secretary of the Interior Standards for Rehabilitation and that necessary for basic housing rehabilitation to households who qualify for housing rehabilitation loans residing in districts eligible for the National Register of Historic Places

VII. Enhance the appearance of Allentown's neighborhoods through proper design of public spaces

- Plant trees and support other activities which improve the landscape and streetscape in previous and current systematic code enforcement inspection areas
- Enhance the coordination of defined neighborhood objectives and infrastructure planning and design

Accomplishments

During the program year St. Luke's Neighborhood Center, through the Elementary Program, conducted three neighborhood clean-ups which involved at least 15 children from the City's Focus area. The Old Allentown Preservation Association offered façade grants, and worked to identify eligible properties during the program year.

Public Safety

Short-Term Objectives and Strategies

I. Create safe and secure residential neighborhoods and commercial districts

- Encourage neighborhood policing by citizen groups and promote coordination between citizen groups and law enforcement
- Support more non-office/non-institutional uses downtown as a way to encourage an active nightlife and after-hours activities that will have the ancillary effect of reducing crime
- Target crime reduction and prevention programs to downtown Allentown and the Central Business District to attract residents after-hours
- Implement plans and objectives associated with the Allentown's Weed and Seed Program related to crime reduction

II. Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods

- Develop a coordinated approach to strengthen and strongly enforce the City's ordinances regarding litter, graffiti, loud music, and loitering
- Require property owners to replace curbs and sidewalks when they are in violation of the City Code, in areas where systematic code enforcement inspections are being conducted
- Enforce the disruptive conduct provision of the Rental Unit Inspection Program
- Hold landlords accountable for tenant safety, and foster dialogue between the City, landlords, and tenants to identify areas for safety improvement

Accomplishments

CDBG funds were used to support the City's on-going code enforcement efforts. Consistent efforts to improve properties in the city results in a more livable environment for all residents and serves to prevent the deterioration of neighborhoods.

b. Provide a breakdown of the CPD formula grant funds spent in attaining the goals and objectives.

See PR 23 in the appendices for more complete information on the status of CDBG funds expended.

Acquisition:	\$ 39,439.68	
Disposition/Property Management:	\$ 43,854.08	
Clearance: 2 properties	\$ 96,277.21	
Relocation: 5 households	\$ 1,600.00	
Economic Development:	\$104,634.76	
Housing:		
Homeownership:	\$ 66,487.25	CDBG
Rehab single unit:	\$ 892,428.23	CDBG
	\$ 510,976.02	HOME
Rehab Multi-unit:	\$ 120,000.00	HOME
Code Enforcement	\$195,211.54	CDBG
Public Services:	\$316,270.65	
Administration:	\$512,978.79	

c. If applicable, explain why progress was not made towards meeting the goals and objectives.

The City had limited resources with which to accomplish the housing goals. The federal funding has been cut while prices and poor conditions continue to escalate, requiring ever greater resources to address. Given the resources available, the City has met its objectives and is working to stabilize neighborhoods.

B. Affirmatively Furthering Fair Housing

a. Actions taken to affirmatively further fair housing.

A definite, distinct, and enforceable City Human Relations Ordinance, as well as an Active Human Relations Commission and internal monitoring, continue to ensure the City's compliance with fair housing laws and contribute to a decrease in discriminatory practices. The City of Allentown completed a comprehensive fair housing plan in 1997, which included an Analysis of Impediments to Fair Housing Choice. Each year, including during FY2011, the City reviews the plan and continues to follow its recommendations, which include:

- Place an emphasis on promoting fair housing – The City and its subrecipients continue to place emphasis on promoting fair housing.
- Provide information to the public on fair housing – The City, through the Fair Housing Officer, provides information to the public on fair housing and responds to fair housing inquiries and complaints.
- Monitor fair housing activities and report fair housing accomplishments – During the preparation of the CAPER, the City reviews its accomplishments, reports accomplishments and, if deemed necessary, will adjust programs accordingly. During the past year, there was no need to adjust programming; however, the City continued its emphasis on fair housing by ensuring programs could be accessed by the City's minority populations.
- Encourage the participation of the representative protected classes on various boards, committees, or task forces as well as the Allentown Human Relations Commission, the deal with matters relating to fair housing – The City encourages participation of all residents, including all classes, to join and participate in board, authorities, and commissions, especially those dealing with fair housing.
- Continue to review and revise the Allentown Zoning Ordinance to further fair and affordable housing – The City planning staff consistently reviews its zoning ordinance to further fair and affordable housing.
- Continue to implement the Affirmative Marketing Policy – The City, subrecipients, and CHDOs continue to follow the Affirmative Marketing Policy that was implemented during the 32nd program year (FY2006) as a result of a review of the comprehensive fair housing plan.
- During the 2011-2012 program year, the City of Allentown anticipated updating its Fair Housing Plan and Analysis of Impediments to Fair Housing Choice (AI). The City completed its Request for Proposal process to secure a consultant to guide the process. The City received five responses. However, prior to awarding the contract, the City was made aware of an opportunity to participate in a Regional Fair Housing Plan and Analysis of Impediments. The Lehigh Valley Economic Development Corporation (LVEDC) was awarded a HUD Sustainability Grant for projects in the County of Lehigh, County of Northampton, City of Allentown, City of Bethlehem and City of Easton. One of the requirements of this grant is a Fair Housing Plan. Representatives from the two counties and three cities met and discussed the exciting opportunity to conduct a Regional AI. All agreed it would be an extremely beneficial endeavor, and HUD granted permission to proceed. At the end of this reporting period, the representatives were working to develop the Request for Proposal and scope of work for the Regional Analysis of Impediments for the Lehigh Valley, to include the County of Lehigh, County of Northampton, City of Allentown, City of

Bethlehem and City of Easton. It is anticipated that the Regional AI will be complete at the end of the next program year.

b. Summary of impediments to fair housing choice.

The inclusive nature of the City's zoning ordinance means does not believe that it impacts negatively upon the ability to develop, maintain, or improve affordable housing.

There are a number of obstacles which may impede the City's ability to provide decent, safe, and affordable housing, not all of which may be within the City's power to correct. These obstacles include:

- Property taxes. Allentown property owners pay real estate taxes to the City, Lehigh County, and the Allentown School District. Each governing body determines its own tax rate. The assessed value of the property is determined by Lehigh County, with the most recent assessment being completed in 1990. Since the City is limited to a one percent earned-income tax under State law, it is heavily dependent upon the real estate tax for revenue. In fact, as the largest source of revenue, the real estate tax provides more than three times the revenue to the City as the earned income tax. The City's tax rate is not excessive compared to other cities of a similar size; however, in comparison to suburban municipalities, Allentown homeowners pay a higher tax rate. This situation wherein the City must disproportionately increase real estate taxes relative to the surrounding municipalities effectively raises costs for purchasing land and developing affordable housing.
- Educational and cultural barriers may also prove to be a deterrent. Many residents lack the language and financial skills necessary to successfully master rental and home-buying procedures.
- Limited financial resources available to assist housing programs. The City does not have the resources to provide affordable housing to all residents.

The City has six codes that address the issue of the health and safety of residential units. Four of the six are based on national standards developed the Building Officials and Code Administrators International (BOCA): building, plumbing, electrical, and fire prevention. In addition, the property rehabilitation and maintenance code and a portion of the City's health code impact the health and safety of residential units, and also are adapted from State and national standards. Since the six codes have been developed in compliance with State and national standards, it seems reasonable to conclude that they do not have a negative impact on the ability to develop, maintain, or improve affordable housing.

By administrative policy, fees are charged for permits or licenses to the extent necessary to recoup the costs of administering and enforcing the various codes. Therefore, fees and charges do not have a negative impact on the ability to develop, maintain, or improve affordable housing.

c. Identify actions taken to overcome effects of impediments identified.

Removing Barriers to Affordable Housing & Mitigating Impediments to Fair Housing

In consideration of the impediments to fair housing mentioned above, the City of Allentown has taken the following steps to remove barriers to affordable housing and mitigate impediments to fair housing:

- Unfortunately, the City has no control over county assessment policy and cannot mitigate the problem cause by uneven tax burden.
- The City allocates portions of each year's CDBG grant to the promotion of fair housing activities in Allentown. In FY2011, this amount was \$50,000.
- To mitigate the problems caused by limited resources from CDBG and HOME funds, the City has sought additional resources including NSP funding to address housing needs.
- During the program year, the City of Allentown joined with the County of Lehigh, County of Northampton, City of Bethlehem and City of Easton to contract with North Penn Legal Services and form a regional Fair Housing Project. North Penn Legal Services now serves to investigate fair housing concerns and promote fair housing not just in Allentown, but throughout the Lehigh Valley. (Please see page _____ for press release regarding this project.) Quarterly meetings are held to discuss fair housing issues and challenges and to offer solutions.
- This Fair Housing Project group worked to develop a comprehensive Fair Housing Summit. The Summit was held in Allentown on April 26, 2012. Over 150 people attended the event and feedback about the event was very positive. Please see page _____ which shows the agenda for this event.

C. Affordable Housing

Evaluate progress in meeting its specific affordable housing objectives, including:

- a. Comparison of proposed numeric goals (from the consolidated plan and annual action plan) with the actual number of extremely low income, low income, and moderate income renter and owner households assisted during the reporting period.

The FY2011 Action Plan included \$2,162,158 in funding for housing which was allocated towards developing or rehabilitating housing for low and moderate income households.

Priority Housing Needs/Investment Plan Table (Table 2A)

Priority Need	5-Yr. Goal	Yr. 2010 Actual	Yr. 2011 Actual	Yr. 2012 Actual	Yr. 2013 Actual	Yr. 2014 Actual
Renters	50	1	3			
0 - 30 of MFI						
31 - 50% of MFI						
51 - 80% of MFI						
Owners	685	67	175			
0 - 30 of MFI						
31 - 50 of MFI						
51 - 80% of MFI						
Homeless*						
Individuals						
Families						
Non-Homeless Special Needs						
Elderly						
Frail Elderly						
Severe Mental Illness						
Physical Disability						
Developmental Disability						
Alcohol or Drug Abuse						
HIV/AIDS						
Victims of Domestic Violence	15	3	4			
Total (Sec. 215 and other)	750	71	182			
Total Sec. 215	750	71	182			
215 Renter	50	1	3			
215 Owner	685	67	175			

* Homeless individuals and families assisted with transitional and permanent housing

* IDIS is not providing accurate counts of persons assisted by income so only category totals are shown.

*HOPWA Units/Households and Funds Expended (C04PR82)

Please see Commonwealth of Pennsylvania reports for HOPWA data. The Commonwealth of Pennsylvania administers the City's HOPWA program.

Annual Housing Completion Goals
(Table 3B)

Grantee Name: City of Allentown Program Year: 2011-2012	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
BENEFICIARY GOALS (Sec. 215 Only)						
Homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	10		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Beneficiaries*	10		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RENTAL GOALS (Sec. 215 Only)						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	10	3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	10		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOME OWNER GOALS (Sec. 215 Only)						
Acquisition of existing units	5		<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units	65	175	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Homebuyer Assistance	20	20	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	90		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMBINED RENTAL AND OWNER GOALS (Sec. 215 Only)						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	75	175	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Homebuyer Assistance	20	20	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Combined Total Sec. 215 Goals*	95		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)						
Annual Rental Housing Goal	10	3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	90	175	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Overall Housing Goal	100	178	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* The total amounts for "Combined Total Sec. 215 Goals" and "Total Sec. 215 Beneficiary Goals" should be the same number.

- b. Report the number of households served meeting the Section 215 requirements of affordable housing (essentially meeting the definitions in 24 CFR 92.252 and 92.254 for renters and owners, respectively).

The following definition of Section 215 goals is excerpted from the federal regulations:

Housing that is for rental shall qualify as affordable housing under this subchapter only if the housing:

1. Bears rents not greater than the lesser of;
2. The existing fair market rent for comparable units in the area as established by the Secretary under section 1437f of this title or;
3. A rent that does not exceed 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area, as determined by the Secretary, with adjustment for number of bedrooms in the unit, except that the Secretary may establish income ceilings higher or lower than 65 percent of the median for the area on the basis of the Secretary's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Housing that is for homeownership qualifies as affordable housing that meets the definition of Section 215 if the housing is defined as:

1. Has an initial purchase price that does not exceed 95 percent of the median purchase price for the area, as determined by the Secretary with such adjustments for differences in structure, including whether the housing is single-family or multifamily, and for new and old housing as the Secretary determines to be appropriate;
2. Is the principal residence of an owner whose family qualifies as a low-income family:
 - In the case of a contract to purchase existing housing, at the time of purchase;
 - In the case of a lease-purchase agreement for existing housing or for housing to be constructed, at the time the agreement is signed; or in the case of a contract to purchase housing to be constructed, at the time the contract is signed for sale or lease, is subject to resale restrictions that are established to recapture the investment of the federal funds in order to assist other persons except where there are no net proceeds or where the net proceeds are insufficient to repay the full amount of the assistance; and if newly constructed, meets the energy efficiency standards promulgated by the Secretary in accordance with section 12709 of this title.

In FY2011, the City allocated funds for the rehabilitation of rental housing at the Cumberland Gardens public housing development along Susquehanna Street. The HOME dollars will be utilized for rehabilitation of rental units which are not public housing units.

The various housing rehabilitation programs assisted 83 housing units. This includes:

- 42 units (6 with CDBG funds and 36 with HOME funds) through the Focus Area Rehabilitation activity for owner-occupied properties
- 41 units through the Focus Area Façade Grants – Residential activity

- Although the Old Allentown Preservation Association worked to identify properties during the year, no units were assisted through the Façade Improvement Program for owner-occupied properties in the Old Allentown neighborhood.

All of these units meet the Section 215 definition.

The various homeownership programs assisted 14 homebuyers, which included:

- Although funds have been allocated, the Alliance for Building Communities (ABC) is still working to identify a property to assist through the Doorway to Homeownership program. ABC will then acquire and rehabilitate the vacant and deteriorated property and sell it to a low and moderate income household.
- 30 households with counseling through the Homeownership Outreach Program being implemented by CACLV.
- 20 low and moderate income households who recently purchased a property and received down payment and closing cost assistance, and 138 individuals who received individual homeownership counseling. Both services were provided by the Neighborhood Housing Services of the Lehigh Valley.

Units purchased under the City's housing programs met the Section 215 definition.

c. Description of efforts to address worst case needs (defined as low-income renters with severe cost burden, in substandard housing, or involuntarily displaced).

The City is involved in expanding housing choice so that families are not forced to live in unsafe housing. However, cost burden remains an issue since Section 8 assistance is limited. Through various programs, the City is engaged in rehabilitating owner and rental housing and developing new affordable housing. In FY2011, the City expended \$1,844,141 in federal funds in support of affordable housing projects.

During the City's rental inspection, units are sometimes deemed to be unfit for human habitation by the Bureau of Building Standards and Safety. If the unit is occupied, CDBG funds are used to provide relocation assistance to move the family to safe and decent housing. In FY2011, the City provided relocation assistance for 5 households that were displaced by code enforcement action against their landlords.

d. Description of efforts to address the accessibility needs of persons with disabilities.

Housing rehabilitation funds made available through the CDBG and HOME Programs and the rental rehabilitation program may be used to make home modifications. During FY2011, 42 households used funds for this purpose, with six households assisted through CDBG funds and 36 households assisted through HOME funds.

CDBG funds are provided to the Lehigh Valley Center for Independent Living (LVCIL) to support services to disabled persons and families for housing search support, tenant-landlord mediation, home modification consultation and housing retention education. These actions increase the housing options available to persons with disabilities and prevent homelessness. LVCIL assisted 125 low and moderate income clients in finding suitable, affordable housing

within the City. Services helped 23 consumers find permanent housing and 67 consumers prevent homelessness, and 58 consumers received education on housing retention.

D. Continuum of Care

- a. Identify actions taken to address the needs of homeless persons and persons with special needs who are not homeless but require supportive housing (including persons with HIV/AIDS). This description must include actions taken to implement a continuum of care strategy for homeless and new Federal resources obtained during the year.
- b. Identify actions taken to prevent homelessness and to help homeless persons make the transition to permanent housing and independent living.
- c. Identify new Federal resources obtained from the Homeless SuperNOFA.

Needs of Homeless Persons and Persons with Special Needs

The City of Allentown is part of the larger Allentown/Northeast Regional area for purposes of planning within the Continuum of Care (CoC). The regional CoC was established by the Commonwealth of Pennsylvania for the purposes of applying for funding through the U.S. Department of Housing and Urban Development. Agencies seeking funding through the Stewart B. McKinney programs (Supportive Housing Program, Shelter Plus Care, etc.) must be part of a cooperative effort within their communities. There are 12 counties and three entitlement cities (Allentown, Bethlehem, and Easton) recognized in the Allentown/NE Regional CoC. The lead entity for the CoC application is the Allentown/Northeast Regional Homeless Advisory Board (NE RHAB).

In addition to the regional CoC, the City of Allentown has its own initiative, which is the **Allentown Plan To End Chronic Homelessness by 2017**. The Plan consists of three primary strategies: Prevention, Intervention, and Infrastructure. *Prevention* strategies address the root causes of chronic homelessness through the provision of eviction prevention services, tenant education, rental assistance, job/vocational training, employment services, intensive case management services, and specialized services designed to address the unique needs of women and children who are homeless. *Intervention* strategies include the closure of all homeless camps and addressing the gaps and barriers in the service delivery system by identifying the chronically homeless, developing affordable housing, and improving access to services that will enable chronically homeless persons to obtain and remain in permanent housing. *Infrastructure* strategies include advocating for services, programs, and policies at the local, state, and national levels that enable chronically homeless persons to live as independently as possible in the community.

Allentown's ten-year plan consists of an evaluation process that includes a Data Collection Process Evaluation and a Planning Process Evaluation. The Data Collection Process Evaluation involves the creation of a database, the collection of data, and the development of annual data reports that will document the progress towards the goal of ending chronic homelessness. The Planning Process Evaluation aids the implementation of the Commission's plan by serving as a feedback loop and a measuring tool for the completion of action steps and interventions.

An important, final element of the Plan includes Phase II. Phase II outlines the strategy for implementation of the ten-year Plan through the creation of an Allentown Commission on Chronic Homelessness supported by Implementation Working Teams. The Allentown Commission on Chronic Homelessness is composed of local shapers and movers in government, social services, churches and non-profit organizations who are charged with promoting the Plan, providing oversight to implementation of the Plan, and expanding the Plan to address the needs of chronically homeless person throughout the region. The Implementation Working Teams are composed of professionals representing organizations that provide Allentown's Plan to End Chronic Homelessness by 2017 services to persons who are chronically homeless. These teams are responsible to implement the plan, consolidate findings and make recommendations to the Commission, and form a coordinated continuum of care to address the needs of persons who are chronically homeless.

Actions Taken to Prevent Homelessness

In the CoC application, NE RHAB reported on actions taken to prevent homelessness and help homeless persons transition to permanent housing. Discharge planning protocols designed to prevent homelessness are described in the homeless goals section. During 2008, 80% of homeless persons residing in transitional housing transitioned to permanent housing.

NE RHAB recognizes discharge planning from institutions as the key to homeless prevention. Discharge from state mental health and correction facilities requires community connections including housing and services to prevent homelessness. These protocols are implemented. Protocols for youth and health care are under development.

Continuum of Care Awards in FY2011

Allentown/Northeast Pennsylvania CoC (PA-509)

Project Name	Program	Awarded Amount
HDC- Permanent Supportive Housing	SHP	\$ 167,910
Pathways TBRA for Families, Youth and Veterans	SHP	\$ 269,604
TOTAL – NEW Projects		\$ 437,514
UCM Shelter Plus Care 2011	S+CR	\$ 62,640
SHP for Persons with Mental Illness #4	SHPR	\$ 120,626
Rural Permanent Supportive Housing Program	SHPR	\$ 125,924
Shelter Plus Care Renewal 2011	S+CR	\$ 155,100
Restoration House	SHPR	\$ 114,853
SHP for Persons with Mental Illness #2	SHPR	\$ 215,964
SHP for Persons with Mental Illness #3	SHPR	\$ 131,770
Supportive Housing for Families	SHPR	\$ 236,273
Supportive Housing Program	SHPR	\$ 468,880
Tenant Based Rental Assistance for the Disabled, Chronically Homeless	SHPR	\$ 203,542
TH for Victims of Domestic Violence 2	SHPR	\$ 52,810
The Transitional Residence Continuum of Care Initiative	SHPR	\$ 110,408
Pathfinders	SHPR	\$ 130,807
TH for Victims of Domestic Violence	SHPR	\$ 33,328
Crossroads Individual	SHPR	\$ 326,308
Outreach and Case Management for the Disabled, Chronically Homeless	SHPR	\$ 168,716
West Hills	SHPR	\$ 143,000
Bradford County Mental Health Rental Assistance Program	SHPR	\$ 97,472
Crossroads Family	SHPR	\$ 257,887
David's by the Lake 2011	SHPR	\$ 87,959
East Side Sayre	SHPR	\$ 35,882
Ferry Street Apartments	SHPR	\$ 69,999
Fountain Springs Permanent Supportive Housing	SHPR	\$ 55,385
HDC-PSH-3	SHPR	\$ 136,087
KennerCourt/Garnet House 2011 SHP	SHPR	\$ 90,403
LCHA Shelter Plus Care	S+CR	\$ 217,920
LV ACT Housing Supports	SHPR	\$ 166,378
NCHA Shelter Plus Care Program	S+CR	\$ 105,408
Allentown Hospitality House Transitional Housing Program	SHPR	\$ 159,570
PA-509 Total:		\$ 4,281,299

E. Other Actions

Describe other actions taken as described in its consolidated plan and annual action plans, including actions to:

- a. Address obstacles to meeting underserved needs.
- b. Foster and maintain affordable housing.
- c. Eliminate barriers to affordable housing.
- d. Overcome gaps in institutional structure and enhance coordination.
- e. Improve public housing and resident initiatives.
- f. Evaluate and reduce lead-based paint hazards.
- g. Ensure compliance with program and comprehensive planning requirements.
- h. Reduce the number of persons living below the poverty level.

Obstacle to meeting underserved needs

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. When feasible, the City of Allentown partners with other public agencies and nonprofit organizations to leverage resources and maximize outcomes involving housing and community development activities. In addition, several other obstacles to meeting underserved needs include:

- *Increased need for affordable housing and supportive services resulting from economic downturn* – while budgets for projects are generally stretched in good economic conditions, the recent economic downturn has exacerbated these issues and concerns; and
- *Increased foreclosures & unemployment* – in addition to the community implications of the recent economic downturn are effects on a more individual basis, such as a high foreclosure rate, the associated problem of poor credit, and rising unemployment.

The City supports a wide array of social services to assist residents of the Focus Area. Funding is provided to:

- P.L.A.C.E. Program
- Daybreak
- School to Career Transition Program
- Make Your M.A.R.K.
- St. Luke's Neighborhood Center
- Earn-A-Bike (Community Bike Works)
- Ways to Work Family Loan Program
- The Next Step to Success (LCCC)
- Program for Women and Families
- Turning Point of the Lehigh Valley

Funds are used to provide tenant education, prevent homelessness, and counseling for homebuyers. CACLV's Community Action Financial Services Program assisted 138 people. Five families received one-on-one counseling. Thirty attended homeownership counseling program seminars, and 82 tenants gained knowledge of rights and responsibilities through the Right Stuff About Renting Program. The Lehigh Valley Center for Independent Living

provided counseling for persons with disabilities to secure affordable and appropriate housing and prevent homelessness.

Much housing in the City was already at affordable levels but the income of the City's residents must be increased in order to make housing more affordable. Job creation and economic development have been pursued to this end. For those households where income is fixed due to age or infirmity, the City would work with the Housing Authority and social services to provide assistance. Budget limitations at all levels of government have hurt such households disproportionately. The high cost of fuel assistance, cut-backs in rent subsidy and mortgage assistance to suspend foreclosure have made it more difficult for low income households to afford housing. The City is not in a position to provide such vital housing assistance.

The City has used CDBG and HOME funds to assist low income homeowners make housing repairs to bring the homes to code compliance. The program has prevented the displacement of families who were unable to make these essential repairs. During the year a total of 19 homeowners rehabilitation needs were addressed in FY2011.

Foster and Maintain Affordable Housing

As described earlier in the CAPER, the City of Allentown has several rental and owner-occupied housing rehabilitation programs, including:

- Assistance with the rehabilitation of non-public housing rental units at the Cumberland Gardens public housing development along Susquehanna Street. Rehabilitation began during the program year.
- The Focus Area Rehabilitation activity, which provides self-forgiving loans for rehabilitation of owner-occupied properties in the systematic inspection area of the Focus Area.
- The Focus Area Façade Grants program which provides grants to property owners located in the low and moderate income area of the Focus Area to rehabilitate the facades of their properties.
- The Façade Improvement Program which provides grant money for façade improvements to owner-occupied properties in the Old Allentown neighborhood.
- The Housing Association and Development Corporation, which acquires, rehabilitates, and resells housing units in the Focus Area. HADC then sells them to low and moderate income households as owner-occupied units.
- The Doorway to Homeownership program that acquires and rehabilitates a vacant and deteriorated property and sells it to a low and moderate income household.
- Counseling through the Homeownership Outreach Program being implemented by Neighborhood Housing Services of the Lehigh Valley.
- A Community Action Financial Services Program being implemented by Community Action Committee of the Lehigh Valley.

Eliminate Barriers to Affordable Housing

The policies and ordinances governing the City of Allentown do not have an adverse effect on the ability to develop, maintain, or improve affordable housing. Allentown has developed policies and procedures that generally support the development of affordable housing.

Institutional Structure

The City of Allentown's Department of Community and Economic Development will be responsible for the overall implementation of the five-year strategy. It will administer the contracts with nonprofit organizations providing housing rehabilitation services, homeownership opportunities, supportive housing for special needs populations, shelter and supportive counseling for the homeless, and social services for those threatened with homelessness. In addition, the Department will review proposals that seek to increase the supply and affordability of standard rental housing units. When addressing the issues of public housing, the Department works in conjunction with Allentown Housing Authority (AHA). In addition, there are several offices within the City's departmental structure that provide housing, economic, and community development services to citizens of Allentown. These include:

- The Bureau of Planning and Zoning works with many community organizations that provide services pursuant to the Plan;
- The Bureau of Building Standards and Safety is responsible for code enforcement, systematic inspections, owner occupied rehabilitation and for demolition of dilapidated buildings;
- The Bureau of Health is responsible for the childhood lead testing program;
- The Redevelopment Authority of the City of Allentown;
- The Allentown Economic Development Corporation; and
- The Allentown City School District also plays an important collaborating role.

Improved Public Housing Management and Resident Initiative

Public housing in Allentown is administered by Allentown Housing Authority (AHA). AHA is responsible for all aspects of the Consolidated Plan dealing with public housing, and for administration of the City's Section 8/Housing Choice Voucher program. While its daily operations are independent of those of City government, AHA works closely with the Department of Community and Economic Development and other agencies to meet the City's low-income housing needs.

HUD has deemed AHA as a "High Performer" based on a rating analysis of twelve factors including vacancies, modernization, rent collection, unit turnaround, and condition of units. AHA is meeting the goals established in its existing 5-Year Plan in the following ways:

- Striving to maintain HUD's High Performer Classification rating;
- Meeting federal economic guidelines for new tenants;
- Maintaining low vacancy rates through efficient operational procedures;
- Beginning the planning process for a voucher home ownership program;
- Continuing the community/resident programs previously underwritten by the Public Housing Drug Elimination Program through use of operating funds and Capital Funds; and
- Continued improvement of the public housing properties through the Capital Fund program.

Allentown Housing Authority's mission is:

To assist the community by providing equal opportunity for housing in decent, safe, and sanitary conditions for the elderly, families, and persons with disabilities within the prescribed federal economic guidelines. In conjunction with this mission will be the ongoing

effort to promote economic self-sufficiency and an improved quality of life within the community.

AHA pledged the following:

Goal I - Maintain housing and a suitable living environment by:

- Reducing public housing vacancies;
- Leveraging private or other public funds to create additional housing opportunities;
- Leveraging a future percentage of the Housing Authority annual Capital Funds appropriation by participating in a statewide issuance of Capital Fund Securitized Revenue Bonds in order to increase the pool of public funds available to rehabilitate, modernize, acquire, or create additional housing opportunities; and
- Acquiring or building units or developments.

Goal II - Improve the quality of assisted housing by:

- Continuing to improve public housing management;
- Continuing to improve voucher management;
- Renovating or modernizing public housing units;
- Demolishing or disposing of obsolete public housing;
- Providing replacement public housing; and
- Providing replacement vouchers.

Goal III - Increase assisted housing choices by:

- Conducting outreach efforts to potential voucher landlords;
- Implementing voucher homeownership program;
- Implementing public housing or other homeownership programs; and
- Implementing public housing site-based waiting lists.

Goal IV - Provide an improved living environment by:

- Designating developments or buildings for particular resident groups (elderly and/or persons with disabilities);
- Continuing efforts to reduce illegal drug activities and crime by supporting programs provided by the Boys and Girls Club activities and Neighborhood Police Programs, in conjunction with the City of Allentown;
- Continuing support for the Tenant Council organizations; and
- Providing referrals to social service agencies as appropriate.

Goal V - Promote self-sufficiency and asset development of assisted households by:

- Increasing the number and percentage of employed persons in assisted families;
- Providing or attracting supportive services to improve assistance recipients' employability; and
- Providing or attracting supportive services to increase independence for the elderly or families with disabilities.

Goal VI - Ensure equal opportunity and affirmatively further fair housing by:

- Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and/or disability; and

- Undertaking affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and/or disability.

As the demand for subsidized housing exceeds the supply, AHA plans to continue to work with City of Allentown to construct/rehabilitate scattered site rental units. It will also work together with the four other public housing authorities in the Lehigh Valley to increase the number of affordable housing units. A good relationship exists between AHA and the City of Allentown, especially with the zoning and code offices which have been very helpful with planning and construction of the Hope VI development, as well as environmental reviews for AHA federal funding awards. Police and Fire departments continue to provide tremendous service to AHA developments and its tenants.

The Homeownership Mortgage Program

Allentown Housing Authority has begun the planning process for an HCV homeownership program. Aspects of the program that have already been decided include the provision of homeownership counseling by AHA and the requirement of a three percent down payment by the prospective homebuyer, with one percent of the down payment coming from the applicant.

Public Housing Resident Participation

Five of the seven public housing developments currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning processes for both the five-year and annual Public Housing Authority (PHA) plans that are submitted to HUD.

The AHA recognizes the inherent difficulty in keeping the resident councils engaged. It plans to seek involvement and support of the councils by scheduling regular meetings with the AHA Executive Director.

Lead-Based Paint Hazard Reduction

Due to the age of the housing stock, particularly the stock available to LMI households, Allentown's Bureau of Health has been active in preventing lead poisoning for children for over 25 years. The Bureau seeks to identify children at risk of lead poisoning, assures medical treatment and case management for the children and their families, and assures that lead hazard reduction activities are conducted in premises where environmental investigations reveal excessive lead levels. The Health Bureau actively screens children for lead poisoning and provides outreach and presentations at family centers, safety carnivals, health fairs, and child care centers. The Bureau collaborates with area hospitals and family health centers to provide and promote lead screenings.

Combining efforts and expertise of the City's Bureau of Building Standards and Safety and Health Bureaus, the City's Lead Hazard Control (LHC) program will focus on units – both owner-occupied and rental units – where children under the age of six reside. Many of these children have been tested by the Health Bureau and have not been found to have dangerously high blood lead levels.

There are several possible explanations for the low incidence of childhood lead poisoning in Allentown. One possible reason is the aggressive housing rehabilitation program, conducted by the City's Bureau of Building Standards and Safety, which is funded through the CDBG Program. Over 5,000 homes have been inspected during the last 29 years. Also, the housing stock in the City is mostly brick, with few painted, wooden structures.

In addition to identifying children and families who may benefit from the LHC program, the Allentown Health Bureau incorporates numerous outreach and education strategies into its activities. Lead poisoning prevention education is offered to families with children under age six including minority and non-English speaking families. Additionally, lead poisoning prevention education is provided to pre-school, child care, and clinics.

Another major component of the LHC program is the training of contractors in Lead Safe Work Practices. In February 2004, 26 workers, representing eight contracting companies, were trained. More training will be offered in the future.

The program complements continuing activities of both the Bureaus of Health and Building Standards and Safety. The Health Bureau's Childhood Lead Poisoning Prevention Program identifies children who were at risk of lead poisoning, assures that medical treatment and case management were done, and that lead hazard reduction activities were conducted in premises where environmental investigations revealed excessive lead levels. This program began in January 1993; however, the City's Bureau of Health has had an active lead poisoning prevention program for approximately 25 years.

Administrative and code enforcement staff continued to take advantage of training opportunities. Also, staff worked to disseminate appropriate information to nonprofit organizations and contractors who will be impacted by these new regulations. The City continues to work with the contractors to expand the number of lead-safe licensed and trained workers.

Ensure Compliance with Program and Comprehensive Planning Requirements

In preparing the Five-Year Consolidated Plan and Annual Plan in 2010, discussion and consultation was conducted with many diverse groups, organizations, and agencies. City departments were also consulted for their input on community development needs. Applications were distributed to non-profits for submission of projects seeking CDBG and/or ESG funding and to non-profit housing developers seeking HOME funds. The goals and objectives of the Consolidated Plan are consistent with the City's comprehensive plan goals.

Reduce the Number of Households with Income Below the Poverty Level

The City believes that the most effective method of lowering the number of households living in poverty is to assist them in developing the skills necessary to become more independent and self-sufficient. This philosophy is reflected throughout the programs that will be implemented by the City.

The most obvious examples of this philosophy are the references throughout the Consolidated Plan to meeting the supportive needs of the homeless, those threatened with homelessness, and those with special needs. In the case of the homeless, the purpose of the supportive services is to assist them in dealing with the problems that led to their

homelessness. Hopefully, their stay in a shelter facility will serve as a transition to permanent housing and a starting point towards developing their independence and self-sufficiency. The City used ESG funds to support the operating budget of emergency shelters and short-term transitional housing programs. This allowed the sheltering organizations to provide more intensive social services to the participants in their programs. In addition, whenever possible, the City assisted the shelter providers in obtaining financial assistance to meet the physical needs of the sheltering facilities.

For persons with special needs who have a permanent disability, it may not be practical to expect a reduction in the number of households with incomes below the poverty line, depending on their level of disability. However, it is possible to offer persons with special needs appropriate options in living environments. Supportive services likely will be an important part of any option chosen. For those who choose to live independently, supportive services will be essential to maintaining their independence. In addition to the services mentioned previously, which are available to all extremely low-income residents, the City funds several services for persons with special needs. For example, it supports a drop-in center for the mentally ill and persons addicted to alcohol or other drugs. The City's housing rehabilitation programs often enable elderly or frail elderly homeowners to remain in their home, and allow those with physical limitations to adapt their home to their specific needs.

To these ends, the City funded public services in FY2011 to address the needs of the homeless, persons with disabilities, and persons in poverty. These activities include:

- P.L.A.C.E. Program - The People Living in Accessible Community Environments (P.L.A.C.E.) Program advances the ability of persons with significant disabilities to live independently and productively in affordable and accessible housing of their choice. The activity is implemented by the Lehigh Valley Center for Independent Living.
- Daybreak - An adult drop-in center for the mentally ill and those recovering from addictions, providing services such as meals, supportive counseling, and recreation in a protective environment.
- Grace Montessori Scholarship Program - Scholarships for low income children, ages three to six, to attend pre-school. The activity is implemented by the Grace Episcopal Church for the Grace Montessori School.
- Ways to Work Family Loan Program - Helps families with no credit or poor credit obtain a low-interest loan to purchase a used car or repair an existing car for the specific purpose of keeping a job or staying in school. The activity is implemented by Family Answers.

Providing jobs and living wages is essential for lifting households from poverty. To this end, the City has invested in job creating activities including:

- Ways to Work Family Loan Program - Helps families with no credit or poor credit obtain a low-interest loan to purchase a used car or repair an existing car for the specific purpose of keeping a job or staying in school. The activity is implemented by Family Answers.

F. Leveraging Resources

- a. Identify progress in obtaining other public and private resources that address needs identified in the plan.

Other federal funds that are available in the City of Allentown include:

- Allentown Housing Authority Section 8 and Public housing programs
- Continuum of Care Supportive Housing Program and Shelter Plus Care
- Neighborhood Stabilization Program
- Low Income Housing Tax Credit

- b. How Federal resources from HUD leveraged other public and private resources.

Federal funds are leveraged by public and private resources particularly for ESG-assisted activities.

	Proposed	Actual
Allentown Rescue Mission		
Individual Donations	\$291,227	\$291,227
TOTAL	\$291,227	\$291,227
Community Action Committee of the Lehigh Valley- Sixth Street Shelter		
Rental Income	\$5,225	\$4,750
FEMA	\$19,306	\$23,808
Client Payments	\$6,500	\$6,343
Lehigh County Office of Children and Youth	\$239,840	\$239,840
CSBG	\$40,982	\$62,566
HPRP	\$183,593	\$184,230
Local Contributions	\$148,782	\$223,999
Housing Case Management	\$17,787	\$16,008
Municipality Income	\$4,400	\$0
TOTAL	\$666,455	\$761,544
Lehigh County Conference of Churches- Pathways Program		
HUD Supportive Housing	\$201,837	\$181,592
City of Allentown HPRP	\$186,620	\$181,604
Lehigh County HPRP	\$95,157	\$75,072
Lehigh County Adult Human Services	\$79,124	\$69,389
FEMA	\$22,244	\$18,625
Trexler Trust	\$5,000	\$10,000
Other Grant Revenue	\$49,318	\$25,167
Contributions	\$76,455	\$56,367
TOTAL	\$715,755	\$617,816
The Salvation Army- Hospitality House Program		
United Way	\$42,000	\$30,800
FEMA	\$20,000	\$24,266
C.A.C.F.P.	\$29,500	\$18,767

Lehigh County	\$25,000	\$20,652
The Salvation Army	\$274,500	\$244,361
TOTAL	\$391,000	\$338,846

c. How matching requirements were satisfied.

The City has a 12.5% HOME match requirement. During FY2011, the City added \$625,000 to its match, creating an excess match amount of \$3,639,020.36

ESG funding must be matched dollar for dollar. The individual agencies must document to the City that they have received at least a sum equal to the City's expenditures.

G. Citizen Comment

Provide a summary of citizen comments it receives regarding the programs covered by its consolidated plan and the disposition of those comments. (Section 91.105(d)(2) of the consolidated plan regulations requires that grantees consider any comments or views of citizens, received in writing or orally at public hearings, in preparing the CAPER.)

No comments or complaints about the CDBG program were received during the past year.

H. Self-Evaluation

Provide an evaluation of accomplishments. This evaluation must include a comparison of the proposed versus actual outcomes of each outcome measure submitted with the consolidated plan and explain, if applicable why progress was not made toward meeting goals and objectives.

The City continued its collaboration with many agencies such as HADC, RACA, ABC, NHS, CACLV, and VHDC as well as lending institutions and other government agencies to encourage continued revitalization of the city's neighborhoods. The federal resources are leveraged by the effort that all these groups bring to the revitalization program.

At this time the City does not anticipate any changes in the strategy.

I. Monitoring

a. Describe how and the frequency with which you monitored your activities.

b. What is the status of your grant programs?

- Are any activities or strategies falling behind schedule?
- Are grant disbursements timely?
- Do actual expenditures differ from letter of credit disbursements?

Monitoring is conducted regularly the staff of the Department of Economic and Community Development. Each nonprofit organization receiving CDBG, HOME or ESG funds must submit monthly progress reports, which enable the City to compare the actual accomplishments to the objectives stated in the contract. Similarly, invoices are compared to the budget contained in the contract. Concerns raised by the progress reports or the invoices

are shared with the nonprofit organization. The financial status of the various activities is reviewed by accounting and administrative staff on a bi-weekly basis.

Subgrantees were monitored on-site during the 37th year. Grantees were notified in writing prior to the visit so they were prepared for the monitoring visit. Items reviewed during the monitoring visit are compliance with eligibility requirements and satisfaction of the National Objective requirement. Other areas in the monitoring review were documentation verifying achievement of outcome based objectives, client files, financial management systems, payroll records and CDBG contract compliance. Letters were sent after the monitoring which detailed finding and/or concerns. When responses from the grantees were received (where applicable), the City responded with a letter approving corrective plans of action. For the 37th year, some weaknesses were found, but none which would render the programs ineligible. HOME rental, homeownership, and CHDO activities were also monitored.

HOME projects are monitored throughout construction. Rental housing projects are monitored for the life of the affordability period. As required by HUD, HOME –assisted rental projects with total units from one to four (1-4) units are inspected every three (3) years, projects from five to twenty-five (5-25) units are inspected every two (2) years; and projects with twenty-six (26) or more units are inspected annually. Monitoring includes a physical inspection to ensure that the units meet code compliance.

Program Narratives

In addition to the general narrative, a grantee must provide narratives that address the following requirements of each of the four consolidated plan programs for which it received funding.

III. CDBG Program

Assessment of Relationship of CDBG funds to Goals and Objectives

- a. Assess the use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the consolidated plan, particularly the highest priority activities.

The attached PR06 and PR 85 reports from IDIS provide an analysis of spending during the past year by type of activity as it relates to the goals of the program.

During the reporting period, the City implemented projects that addressed high and medium priority needs for both housing and non-housing issues using its federal funding.

Priority Community Development Activities
(Table 2B)

Priority Need	5-Yr. Goal Plan/Act	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
Acquisition of Real Property	70	14/8	0			
Disposition	180	36/4	25/25			
Clearance and Demolition	30	6/6	6/2			
Clearance of Contaminated Sites						
Code Enforcement	1500	300/300	300/318			
Public Facility (General)						
Senior Centers						
Handicapped Centers						
Homeless Facilities						
Youth Centers						
Neighborhood Facilities						
Child Care Centers						
Health Facilities						
Mental Health Facilities						
Parks and/or Recreation Facilities						
Parking Facilities						
Tree Planting						
Fire Stations/Equipment						
Abused/Neglected Children Facilities						
Asbestos Removal						
Non-Residential Historic Preservation (façade)						
Other Public Facility Needs						
Infrastructure (General)						
Water/Sewer Improvements						
Street Improvements						
Sidewalks (incl. curb cuts)		100/100	0			
Solid Waste Disposal Improvements						
Flood Drainage Improvements						
Other Infrastructure						
Public Services (General)	33555	6711/ 21716	7257/854 63			
Senior Services						

Handicapped Services	260	52/152	50/205			
Legal Services						
Youth Services	2125	425/1812	425/1888			
Child Care Services	40	8/25	8/27			
Transportation Services						
Substance Abuse Services						
Battered & Abused Spouses	20	4/3	4/7			
Employment/Training Services	250	50/149	50/133			
Health Services						
Lead Hazard Screening						
Crime Awareness						
Fair Housing Activities						
Tenant Landlord Counseling						
Other Services (homeless/ prevention)						
Economic Development (General)						
C/I Land Acquisition/Disposition						
C/I Infrastructure Development						
C/I Building Acq/Const/Rehab		3				
Other C/I						
ED Assistance to For-Profit						
ED Technical Assistance	100	20/0				
Micro-enterprise Assistance	110	22/109	22/156			
Other: Relocation	100	20/11	20/5			

b. Evaluate progress toward meeting the goals of providing affordable housing using CDBG funds, including the number and types of households served.

The City is making progress towards meeting its affordable housing and community development goals, as shown in the above chart.

c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

The City used all of its CDBG funds for activities that met one of the three national objectives under the CDBG regulations during the reporting period. During FY2011, 92% of funds were expended on activities which benefit low to moderate income persons.

CDBG Program Beneficiaries by Income*				
	Income Levels	Owner-Occupied	Renter-Occupied	Persons
Housing	Extremely Low	27	0	0
	Low	49	0	0
	Moderate	43	0	0
	Total	119	0	0
Non-Housing	Extremely Low	0	0	1094
	Low	0	0	285
	Moderate	0	0	239
	Total	0	0	1618

*PR23, Part 4

Changes in Program Objectives

Identify the nature of and reasons for any changes in program objectives and indications of how the jurisdiction would change its programs as a result of its experiences (24 CFR 91.520(c)).

There were no changes in program objectives nor are any expected. The City will continue to focus efforts on housing rehabilitation, increasing homeownership and addressing neighborhood revitalization.

Neighborhood Revitalization Strategies

Grantees with HUD-approved neighborhood revitalization strategies must describe progress against benchmarks for the program year. For grantees with federally designated Enterprise Zones (EZs) or Empowerment Communities (ECs) that received HUD approval for a neighborhood revitalization strategy, reports required as part of the EZ/EC process shall suffice for purposes of reporting annual progress (24 CFR 91.215(e)(2)).

The city does not have a HUD – approved neighborhood revitalization area, nor EZ or EC designated area.

Section 108 Loan Guarantee

Grantees with Section 108 loan guarantee projects should describe actual accomplishments.

The City does not have any new Section 108 Loan proceeds.

IV. HOME Program

Assessment of Relationship of HOME funds to Goals and Objectives

- a. Assess the use of HOME funds in relation to the priorities, needs, goals, and specific objectives in the consolidated plan, particularly the highest priority activities.

HOME funds in FY2011 were allocated for several housing rehabilitation activities and a new housing development. These are all high priority activities identified in the Consolidated Plan.

HOME PROGRAM			
Program	Allocation	Proposed Units	Actual Units
<i>Goal: maintain and improve the condition of the owner-occupied housing stock</i>			
SFL Rehabilitation Focus Area	\$406,715	40	36 HOME
Housing Association & Development Corp. (incl. operating costs)	\$149,318	3	0 Completed
<i>Goal: improve access to homeownership for low and moderate income households</i>			
Doorway to Homeownership (incl. operating costs)	\$40,000	1	0 Completed
<i>Goal: maintain and improve non-public housing rental units in public housing developments</i>			
Cumberland Gardens Rehabilitation	\$500,000	10	0 Completed
TOTAL	\$1,096,033	54	36 completed

- b. Evaluate progress toward meeting the goals of providing affordable housing using HOME funds, including the number and types of households served.

The City's HOME Program is striving to meet the goals for providing affordable housing. The rental project at Cumberland Gardens began during the program year. Alliance for Building Communities Greystone Project was completed during the program year and three home assisted rental units were occupied. Also during this year, the City's rehabilitation program for owner-occupied units assisted 36 households rehabilitate their owner-occupied properties. HADC was able to continue work on the North Street Project-construction of homeownership units and begin work on some scattered site rehabilitation of units to be sold to low income homebuyers. No projects were completed and occupied during the program year.

- c. Indicate the extent to which HOME funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

HOME funds are used to rehabilitate owner occupied housing, assist first-time homebuyers and create affordable rental housing in addition to providing rehabilitation loans for owner-occupied households. Refer to Affordable Housing Section on [page 21](#).

HOME Beneficiaries by Income*		
Income Levels	Owner-Occupied	Renter-Occupied
Extremely Low	12	2
Very Low	12	0
Low	5	1
Other Low	7	0
Total	36	3

HOME Match Report

Use HOME Match Report (HUD-4107A)) to report on match contributions for the period covered by the consolidated plan program year. (Although the requirement for matching contributions is based on the Federal fiscal year, the reporting is based on the PJ's program year and the PJ should modify this report to indicate its program year (91.220(b)(2), 91.320(b)(2), and 91.420(b)).

The HOME Match Report, HUD Form 40107-A is attached and adjusted to reflect the City's program year. There was a total of \$681,393.30 of expenditures in HOME funds during Federal Fiscal Year 2011 (July 1, 2011 to June 30, 2012) requiring match. The City has a 12.5% match liability. Accordingly, the City of Allentown incurred a match liability of \$123,671.63. During Fiscal year 2011, the City added \$625,000 to its match, creating an excess match amount of \$3,639,020.36

HOME MBE and WBE Report

Use Part III of HUD-4107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).

MBE/WBE forms can be found in the Appendices.

Assessments

- Detail results of on-site inspections of rental housing.
- Describe the HOME jurisdiction's affirmative marketing actions.
- Describe outreach to minority- and women-owned businesses.

Monitoring

During the 37th program year, both Alliance for Building Communities and Housing Association and Development Corporation were monitored. HOME funded projects are monitored throughout construction. Rental housing projects are monitored for the life of the affordability period. As required by HUD, HOME assisted rental projects with total units from one to four (1-4) units are inspected every three (3) years, projects from five to twenty-five (5-25) units are inspected every two (2) years; and projects with twenty-six (26) or more units are inspected

annually. Monitoring includes a physical inspection to ensure that the units meet code compliance. Income certifications are also reviewed. However, the City of Allentown tries to monitor HOME assisted rental projects on a yearly basis.

Affirmative Marketing Plan

The City of Allentown, the Redevelopment Authority of the City of Allentown, Neighborhood Housing Services of the Lehigh Valley (NHSLV), Housing Association and Development Corporation (HADC), and Alliance for Building Communities (ABC) all work together to promote housing programs and affirmatively further fair housing to assure compliance with 24 CFR 92.351. The purpose of the City of Allentown's Affirmative Marketing Policy is to communicate to the general public that the City of Allentown's housing programs are administered in a nondiscriminatory manner. The City's policy state that all HOME subrecipients and CHDOs must include the equal housing opportunity logotype or slogan in all outreach to the general community; they must display HUD's Fair Housing Poster wherever sales/rental and showings take place; they must identify populations that are least likely to apply for assistance without special outreach, and tailor affirmative marketing accordingly; they must complete HUD Form 935.2A and/or 935.2B, Affirmative Fair Housing Marketing Plan; they are encouraged to publish all advertisements, brochures, and other written material in other languages in order to reach non-English speaking clients; and, to use specific mailing lists of organizations whose membership or clientele consists primarily of protected class members.

In addition to the above stated policy, the City of Allentown staff walked door-to-door in the low and moderate income, minority neighborhoods to assist residents with the City's housing rehabilitation loan programs. Several staff members are bilingual, bi-cultural (Hispanic) and one is bi-lingual, bi-cultural in Vietnamese. Guidelines for programs are printed in English and Spanish. NHS, HADC, and ABC have outreach staff who are bi-lingual and bi-cultural (Hispanic) who provide extensive outreach to promote and assist their housing programs.

Outreach to MBE/WBE

During FY2011, the City committed funds for the rehabilitation of 36 owner-occupied and 3 renter units. Of the 36 homeowners, 19 (53%) were Hispanic, three (12%) were Black/African American and two (.05%) were Asian. Female-headed households accounted for 18 (50%) of the homeowners.

During FY2011, the City had four Minority-Owned Businesses working on HOME-funded activities. It is anticipated that during FY2012, the City will continue to work to recruit Minority and Women Business Enterprises.

V. HOPWA Program

The Commonwealth of Pennsylvania administers the HOPWA program and reports separately to HUD.

VI. Emergency Shelter Grants Program

Assessment of Relationship of ESG Funds to Goals and Objectives

- a. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).

The City's Consolidated Plan placed a high priority on the emergency shelter needs of family and individuals. The objective to meeting that priority is to "contribute to meeting the shelter and service needs of homeless residents." Activities supported with ESG funds were directed to the three shelters and one homeless prevention program located within the City of Allentown. The shelter facilities are the Allentown Rescue Mission, Inc.; The Salvation Army – Allentown, PA Corps; and the Sixth Street Shelter which is operated by the Community Action Committee of the Lehigh Valley. The homeless prevention program, Pathways, is administered and operated by the Lehigh County Conference of Churches.

The Allentown Rescue Mission serves unaccompanied homeless men. They have a 48-bed capacity and during this program year, the Mission served 645 homeless men. This program year's clients were 64.2% White (not of Hispanic origin), 34.3% Black (not of Hispanic origin), .8% Asian (not of Hispanic origin), .3% American Indian/Alaskan Native (not of Hispanic origin), .4% Native Hawaiian/Other Pacific Islander (not of Hispanic origin), and 25.7% Hispanic. The Rescue Mission did not serve any clients who were persons with disabilities.

The Salvation Army – Allentown, PA Corps provides shelter for mostly women and children, with one unit reserved for a complete family. They have a 45-bed capacity. The total number of women and children sheltered this past year was 255 (124 adults and 131 children). The percentage breakdown for the Salvation Army's clients was 58.8% White (not of Hispanic origin), 37.7% Black (not of Hispanic origin), 3.5% Other Races (not of Hispanic origin), and 52.6% Hispanic. The total number of female heads of households served during this program year was 255.

The Sixth Street Shelter is operated by the Community Action Committee of the Lehigh Valley and houses families in the Shelter's 20 apartments which has a 92-bed capacity. During this program year, the Shelter housed a total of 349 persons comprised 129 adults and 220 children. The percentage breakdown for clients of the Sixth Street Shelter was 9% White (not of Hispanic origin), 25.8% Black (not of Hispanic origin), .6% Asian (not of Hispanic origin), 2.9% Black/African and White (not of Hispanic origin), .6% American Indian/Alaskan Native & Black or African American (not of Hispanic origin), 8.9% Other Races (not of Hispanic origin), and 52.1% Hispanic.

Additionally, the City funded the Pathways program which is administered by the Lehigh County Conference of Churches. Pathways is Lehigh County's leading referral agency for

any basic human need. Pathways' goal is to provide men, women, and families who are homeless or threatened with homelessness with the services and supports that they need to move, find and maintain permanent housing. In 2011, Pathways assisted 61 persons, 29 adults and 32 children. Twenty three families received cash assistance to remain in their rental units and prevent homelessness.

b. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the consolidated plan.

The City is meeting its goals for providing ESG funds to programs that serve persons who are homeless or are threatened by homelessness. The Pathways program helps families remain stably housed through short-term rent assistance. The specific homeless objectives identified in the Housing Goals Section, page 9, identifies the need to work with the shelter and services providers to address the needs of people who are homeless and to connect homeless people with special needs to permanent supportive housing.

c. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.

The Continuum of Care does not have a comprehensive homeless strategy for the 17 county region. However, the City's Plan to End Chronic Homelessness by 2017 does identify the need to provide short-term interventions. The strategies stated in that plan are: **Prevention** strategies address the root causes of chronic homelessness through the provision of eviction prevention services, tenant education, rental assistance, job/vocational training, employment services, intensive case management services, and specialized service designed to address the unique needs of women and children who are homeless. **Intervention** strategies include the closure of all homeless camps and addressing the gaps and barriers in the service delivery system by identifying the chronically homeless, developing affordable housing, and improving access to services that will enable chronically homeless persons to obtain and remain in permanent housing. .

The shelters make it possible to stabilize homeless individuals and move them to permanent and supportive housing as it becomes available.

Matching Resources

Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.

	Proposed	Actual
Allentown Rescue Mission		
Individual Donations	\$291,227	\$291,227
TOTAL	\$291,227	\$291,227
Community Action Committee of the Lehigh Valley- Sixth Street Shelter		
Rental Income	\$5,225	\$4,750
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Lehigh County	\$25,000	\$20,652
The Salvation Army	\$274,500	\$244,361
TOTAL	\$391,000	\$338,846

State Method of Distribution

States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.

Not Applicable.

Activity and Beneficiary Data

Completion of Emergency Shelter Grant Program Performance reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.

The performance reports are contained in IDIS Reports in the Appendices. The City works closely with the ESG grantees and had no difficulties collecting the required information. We believe the information to be reliable.

Homeless Discharge Coordination

As part of the government entity developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very low-income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.

Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

- a. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
- b. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

The NE RHAB recognizes discharge planning from institutions as the key to homeless prevention. Discharge from state mental health and correction facilities requires community connections including housing and services to prevent homelessness. These protocols are implemented. Protocols for youth and health care are under development.

Foster Care Discharge Policy

The Prevention Subcommittee of the Allentown/Northeast PA Continuum of Care Steering Committee (which includes a representative from the CoC) is assisting DCED in the development of a universal discharge tool to be used for youth exiting foster care. The committee expects to have the protocol in place in 2012. It will include information such as where the youth anticipates living following discharge, the cost of housing, and the source of income, as well as two contingency plans. The planning tool will also verify that youth have legal documentation in order to obtain housing (a birth certificate, social security card, and state ID). Currently, one member of the CoC provides case management and independent living services (funded through the Chafee Act) for foster care youth within the CoC to prepare them for a successful transition from care.

In an effort to promote independent living practice standards for youth transitioning from foster care, in 2006/07 the Allentown/ Northeast Pennsylvania CoC adopted funding priority to McKinney grantees who work with youth exiting the foster care system. In 2006/07, Valley Youth House, a leading regional provider of transitional and permanent housing with support to homeless youth and their families, sought to open and begin occupancy of Youth Moving Forward; a 21 bed project for this special needs population. Other regional efforts to lift up the plight of our homeless youth, including those exiting foster care, were created including relevant prevention sections of the 2007 release of "Allentown's Plan to End Chronic Homelessness by 2017."

Health Care Discharge

Hospitals in Pennsylvania must have written discharge policies for appropriate referral and transfer plans that comply with Pennsylvania Code (028 Section 105). Further, the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) requirements prohibit the release of individuals without a discharge plan that includes having a place to live. To provide further assistance in finding appropriate accommodations for persons with disabilities, the Commonwealth's Ten Year Plan to End Homelessness calls for increased use of SOAR (SSI/SSDI Outreach, Access, and Recovery Program). SOAR allows users to explore various accommodation options for people with disabilities. The system is currently in use in Lehigh and Allegheny Counties, and Philadelphia.

Mental Health Discharge

The Commonwealth of Pennsylvania has a formal policy that no discharge from a state hospital can occur unless all housing, treatment, case management, and rehabilitation services are in place at the county level. The Pennsylvania Department of Public Welfare/Office of Mental Health and Substance Abuse Services (OMHSAS) sets this policy. In 2006, the Housing Work Group of the Adult Advisory Committee of the OMHSAS unveiled the *Plan for Promoting Housing and Recovery-Oriented Services*. The Housing Work Group offered the following philosophy:

“Stable housing is an essential component of mental health recovery. People with serious mental illness and co-occurring disorders must have access to a comprehensive array of permanent, affordable, barrier free housing options as well as the supports necessary for them to obtain and maintain the housing of their choice.”

Correctional Institution Discharge

The Commonwealth of Pennsylvania has a formal policy that no individual may be discharged from a State Correctional Institution without an approved Home Plan. It requires the continuity of care planners in each institution make every effort to assure a viable home plan and follow-up services for all who will be released. In order to expedite re-entry, the PA Department of Corrections (DOC) issued a policy statement on Inmate Reentry and Transition on January 5, 2006. This policy includes providing each inmate being released from a State Correctional Institution with written information on housing, a photo ID, and other personal documents. Regional efforts which bring life to the guiding vision and policy of the Dept. of Corrections include:

- SPORE (Special Program for Offenders in Rehabilitation and Education):

- Identifies persons with a serious mental illness involved in the criminal justice system; provides advocacy, accountability, and assistance thereby leading the person to a greater degree of health, responsibility, proficiency, and quality of life.
- MISA (Mental Illness/Substance Abuse): Inmates of Lehigh County Prison with an identified psychiatric disorder are assessed for secondary drug and/or alcohol abuse issues as part of their initial evaluation. Treatment services are provided and wrap around to community-based providers. Recovery tools are provided that may help inmates learn to stay clean and sober and housed upon discharge.

OTHER ATTACHMENTS AND NARRATIVES

Attach copies of a summary of specific objectives and annual housing completion goals from the consolidated plan, (i.e. Table 1C, 2C, 3A, 3B).

The grantee must submit an updated Financial Summary Report (PR26), and other information required by regulations located at 24 CFR 91.520.

Include any CAPER information not covered by narratives in any other section.

The following IDIS reports with an asterisk (*) contain information that must be provided to citizens in order to satisfy annual performance report requirements contained for Consolidated Plan under 24 CFR 91.520.

*Summary of Accomplishments Report (C04PR23) presents data on CDBG/HOME activity counts and disbursements by priority need categories. It also contains data on CDBG accomplishments by various units of measure and housing units by racial/ethnic categories and HOME housing units by various income groups.

*Summary of Consolidated Plan Projects for Report Year XXXX (C04PR06) tracks progress in implementing projects identified in the action plan. This report lists all projects for a plan year in sequence by project number. Disbursements are summarized by program for each project's activities.

*Financial Summary Report (C04PR26) provides the key CDBG program indicators. This report shows the obligations, expenditures that the grantee has made for a specified program year. The expenditures are summarized to determine the relevant indicators for low- and moderate-income, planning/ administration, public service activities and economic development. (This report contains program year information on statutory requirements regarding overall percentage for low- and moderate-income benefit.)

*Summary of Activities (C04PR03) - lists each CDBG activity that was open during a program year. For each activity the report shows the status, accomplishments, program year narrative and program year expenditures. For each activity the report also shows the activity code, regulation cite and characteristics of the beneficiaries.

Outcome Performance Measurement Reports

*CDBG Performance Measures Report (C04PR83)

*CDBG Strategy Area, CDFI, and Local Target Area (C04PR84)

*HOME Housing Performance Report (Grantee/PJ) (C04PR85)

*ESG Performance Measures Report (C04PR81)

*HOPWA Measuring Housing Stability Outcomes (C04PR80)